

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER DAVID BAILEY  
Debtor

CHAPTER 13

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1:24-bk-01674-HWV

vs.

CHRISTOPHER DAVID BAILEY  
Respondent

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on December 23, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney Douglas R. Roeder, Esquire, and respectfully represents the following:

1. A Plan was filed on July 8, 2024.
2. A hearing was held, and an Order was entered on November 20, 2024, directing that an amended plan be filed within thirty (30) days.
3. As of the date of this Motion, an amended plan has not been filed.
4. The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire  
Id: 80016  
Attorney for Movant  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: 717-566-6097  
email: [droeder@pamd13trustee.com](mailto:droeder@pamd13trustee.com)

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**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 4B  
1501 North 6th Street  
Harrisburg, PA 17102

Date: 01/22/2025

Time: 9:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: December 23, 2024

/s/ Douglas R. Roeder, Esquire

Id: 80016

Attorney for Movant

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Drive

Hummelstown, PA 17036

Phone: 717-566-6097

email: [droeder@pamd13trustee.com](mailto:droeder@pamd13trustee.com)

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**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on December 23, 2024, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1st Class mail from Hummelstown, PA, unless served electronically.

Served electronically  
MICHAEL A CIBIK, ESQUIRE  
CIBIK LAW, PC  
1500 WALNUT ST, SUITE 900  
PHILADELPHIA, PA 19102

UNITED STATES TRUSTEE  
1501 NORTH 6TH STREET  
BOX 302  
HARRISBURG, PA 17102

Served by 1st Class Mail  
CHRISTOPHER DAVID BAILEY  
18 N FRANKLIN ST  
WAYNESBORO, PA 17268-1208

I certify under penalty of perjury that the foregoing is true and correct.

Date: December 23, 2024

/s/ Kurtis Bowers  
Office of Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: 717 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

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**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application